

REMARKS

Claims 1 and 6 are formally amended. In response to the Office Action:

[Objection] Claim 6, which was objected to, has been amended. Claims 1-13 remain present in this application.

[§102] Claim 1, 2, 4, 5, 6, 8, 10, 12, and 13 stand rejected under 35 USC 102(b) as being anticipated by Fullerton et al. (US 5339139 A). This rejection is respectfully traversed.

Fullerton. The Examiner (page 3, bottom of ¶ 2) quotes Fullerton at col. 14, line 59, for stating that “baffle lip 52 extends below the upper surface of the platen portion 12b.” However, the applied text does not explain which *portion* of the lip 52 extends below the surface, or state that all of it is below the surface. The Applicant sees in Fullerton’s figure that the upper tip of the lip 52 is level with the surface (this is the tiny rounded arc over the gap between the two platens). Fullerton explicitly states at col. 15, line 30, that “The baffle 52 may have a solid portion ending above the platen surface.”

With respect, if Fullerton’s “lip or catch 52 (col. 14, line 61) were not at least at the level of the upper platen surface, it would not catch anything, would be useless, and would not live up to its name. Fullerton explains (text spanning columns 14-15) that with the catch 52, “all documents ... are positively caught and deflected upwardly into the next feed nip ... This overcomes a serious problem in the previous attempts to use regular platen glass for a CVT scanning station. Specifically, it is desired to positively feed the sheet [for] sliding across, the platen glass surface.... This makes it very difficult to remove the document from the platen glass surface, especially with high sheet beam strengths or under low humidity conditions where high static adhesion forces may occur between the document and the platen glass.”

From this passage, it appears that the catch 52 is provided to buckle the document upward and thereby break the adhesion between it and the platen glass.

Clearly, since the two platens are at the same level and have only a narrow gap, the catch 52 must extend at least to the surface level if it is to interact with the document sheets by stopping the forward motion of the leading edge, which appears to be the mechanism disclosed. The front edge of the document moves from a lower level (on the surface of the platen portion 12b/flatbed glass) to a higher level (baffle lip 52), such that it is blocked by the baffle lip 52 and then deflected to the feeding path.

The Claims. In contrast, according to the Applicant the side of the opening corresponding to the paper-feeding path is lower than the surface of the flatbed glass, and there is no catch. The front edge of the media, such as a paper sheet, moves from a higher level (i.e., on the surface of the flatbed glass) to a lower level (on the feed path), so that the media smoothly moves from the flatbed glass to the feeding path without being blocked, interfered, or deflected. This is the opposite of what Fullerton discloses.

Furthermore, the groove or the beveled platen edge 56 of Fullerton is not provided to make the platen portion 12b/flatbed glass be higher than the opening of the element 12a. The groove or the beveled platen edge 56 is provided to allow the elements 12a and 12b to be much more closely adjacent, or even to directly contact one another (column 15, lines 36-42). Fullerton et al. does not teach, hint, or suggest making the platen portion 12b/flatbed glass higher than the opening of the element 12a. On the contrary, a baffle lip 52 is placed on the side of the opening of the element 12a, to make the platen portion 12b/flatbed glass be lower than the opening of the element 12a.

In other words, the media moving from the flatbed glass to the feeding path of the application moves from a higher level to a lower level directly. The media moving from the flatbed glass to the feeding path of the Fullerton et al. moves from a lower level, to be blocked and deflected, and then to a higher level. The moving path of the media of this application is different from that of the Fullerton et al.

As for the aforementioned reasons, it is submitted that Claim 1 is in condition for allowance.

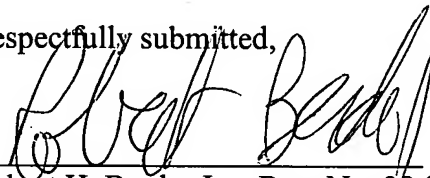
Regarding to Claims 2, 4, 5, 6, 8, 10, 12, and 13, as the independent Claim 1 overcomes the rejection under 35 USC 102(b), therefore the claims dependent are also allowable.

New claims 14 and 15 recite additional features that are not disclosed by Fullerton.

[§103] Claims 3, 7, 9, and 11 stand rejected under 35 USC 103(a) as being unpatentable over Fullerton et al. This rejection is respectfully traversed on the basis of dependence from an allowable claim.

Withdrawal of the rejection and allowance of all claims are requested.

Respectfully submitted,



Robert H. Berdo, Jr. - Reg. No. 38,075
RABIN & BERDO, P.C.
CUSTOMER NO. 23995
Telephone: (202) 371-8976
Fax: (202) 408-0924

May 31, 2007
Date

RHB/NSB/vm